

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
YONKERS RACING CORPORATION,
a New York Corporation,

Plaintiff,

v.

ARCH INSURANCE COMPANY,
a Missouri Corporation,

Defendant
-----X

STATE OF NEW YORK)
SS:
COUNTY OF WESTCHESTER)

Fee paid
#500 E615797

Case No.: 07 CIV. 6200

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

ECF CASE

FILED
U.S. DISTRICT COURT
2007 AUG -7 A 11:16
S.D. OF N.Y. W.P.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, VINCENT W. CROWE, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicants' Name: STEPHEN ROSENFELD, ESQ.
and DANIEL O'LEARY, ESQ.

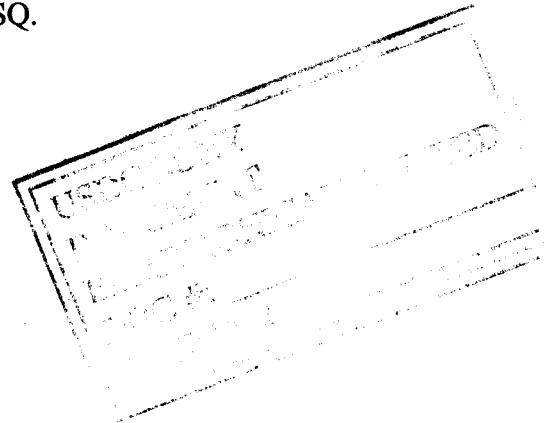
Firm Name: Mandell Menkes, LLC

Address: 333 West Wacker Drive

City/State/Zip: Chicago, Illinois 60611

Phone Number: 312 251-1000

Fax Number: 312 251-1010




Stephen Rosenfeld and Daniel O'Leary are members in good standing of the Bar of the State of Illinois.

There are no pending disciplinary proceedings against Stephen Rosenfeld or Daniel O'Leary in any State or Federal Court.

Dated: White Plains, New York
August 3, 2007

BLEAKLEY PLATT & SCHMIDT, LLP

By: 

Vincent W. Crowe
SDNY Bar Code: 4701
Attorneys for Plaintiff
Yonkers Racing Corporation
One North Lexington Avenue
P.O. Box 5056
White Plains, New York 10602-5056
Phone Number: (914) 949-2700
Fax Number: (914) 683-6956

TO: Joel M. Simon, Esq.
Attorney for Defendant
Smith Mazure Director Wilkins
Young & Yagerman, P.C.
111 John Street
New York, NY 10038-3198

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Daniel V. O'Leary Jr.

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Daniel V. O'Leary Jr.
was duly admitted to practice in said Court on (03/02/1967)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (07/25/2007)

Michael W. Dobbins, Clerk,

By: David A. Jozwiak
Deputy Clerk

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Stephen J. Rosenfeld

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Stephen J. Rosenfeld
was duly admitted to practice in said Court on (12/16/1993)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (07/25/2007)

Michael W. Dobbins, Clerk,

By: David A. Jozwiak
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

YONKERS RACING CORPORATION,
a New York Corporation,

Plaintiff,

v.

ARCH INSURANCE COMPANY,
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Defendant

-----X

STATE OF NEW YORK)
 SS:
COUNTY OF WESTCHESTER)

Case No.: 07 CIV. 6200

**AFFIDAVIT OF
VINCENT W. CROWE
IN SUPPORT OF MOTION TO
ADMIT COUNSEL
PRO HAC VICE**

ECF CASE

VINCENT W. CROWE, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Daniel O'Leary and Stephen Rosenfeld as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in May 1986. I am also admitted to the bar of the United States District Court for the Southern District of New York and Eastern District of New York, and am in good standing with this Court.

3. I have known Daniel O'Leary since 1995, and I have known Stephen Rosenfeld for approximately six months.

4. Mr. Rosenfeld is a member and Mr. O'Leary is Of Counsel at the firm of Mandell Menkes in Chicago, Illinois.

5. I have found Mr. Rosenfeld and Mr. O'Leary to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

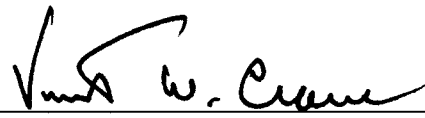
6. Accordingly, I am pleased to move the admission of Stephen Rosenfeld and Daniel O'Leary, pro hac vice.

7. I respectfully submit a proposed order granting permission for Stephen Rosenfeld and Daniel O'Leary to appear pro hac vice, which is attached as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Daniel O'Leary and Stephen Rosenfeld pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: White Plains, New York
August 3, 2007

BLEAKLEY PLATT & SCHMIDT, LLP

By: 
Vincent W. Crowe
SDNY Bar Code: 4701
Attorneys for Defendant
Yonkers Racing Corporation
One North Lexington Avenue
P.O. Box 5056
White Plains, New York 10602-5056
(914) 949-2700

Sworn to before me this
3rd day of August, 2007


NOTARY PUBLIC

CHRISTINE HARRINGTON
Notary Public, State of New York
No. 01HA6138788
Qualified in Westchester County
Commission Expires: December 27, 2009

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 SS:
COUNTY OF WESTCHESTER)

CHRISTINE HARRINGTON, a being duly sworn deposes and says:

I am not a party to this action, and am over the age of 18 years and reside at Yonkers, New York.

On August 3, 2007, I served a true copy of the **MOTION TO ADMIT COUNSEL PRO HAC VICE** and **AFFIDAVIT OF VINCENT W. CROWE IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE** in the following manner:

- ☐ by transmitting the same to the attorney by electronic means to the telephone number or other station or other limitation designated by the attorney for that purpose. In doing so I received a signal from the equipment of the attorney indicating that the transmission was received and mailed a copy of same to that attorney, in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee as indicated below.
- ☐ by delivering the same personally to the person(s) and at the address indicated below a true copy of the annexed upon:
- ☐ by mailing the same in a sealed envelope with an overnight delivery service in a wrapper properly addressed. Said delivery was made prior to the latest time designated by said service. The address and delivery service are designated below:
- By depositing a true copy thereof, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State addressed to each of the following persons at the last known address set forth after each name:

TO: Joel M. Simon, Esq.
Smith Mazure Director Wilkins
Young & Yagerman, P.C.
111 John Street
New York, NY 10038-3198


CHRISTINE HARRINGTON

Sworn to before me this
3rd day of August, 2007


NOTARY PUBLIC

HEATHER RUSSO
Notary Public, State of New York
No. 01RU6130827
Qualified in Westchester County
Commission Expires: July 25, 2009